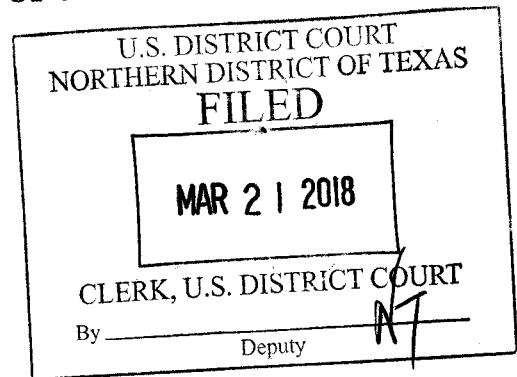


**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF TEXAS**

**DALLAS DIVISION**



SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

v.

Case No. 3:09-cv-00298-N

STANFORD INTERNATIONAL BANK, LTD. ET AL,

Defendants

**MOTION FOR LEAVE TO FILE AN INTERVENING COMPLAINT**

**PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 24(a)**

Comes now, the undersigned individual, proceeding pro se, who has a substantial interest in the outcome of this litigation, hereinafter collectively referred to as "The Claimant", seeking leave

The right to intervene under Rule 24(a) exists when the applicant can show that the current representation of his interests may be inadequate. see, *Wilson v. The Service Companies*, 2017 U.S. Dist. LEXIS 71983 (N.D. Miss., May 11, 2017) (citing) *Texas v. United States*, 805 F.3d 653,657 (5th Cir. 2015); see also, *Newby v. Enron Corp.* 443 F.3d 416,422 (5th Cir. 2006) ("This [Rule 24] request has been construed liberally.")

The 'interests' of the undersigned Claimant, who is a (1) holder of 'Certificates of Deposit' (CDs) purchased from Stanford International Bank, Ltd.; (2) registered with the court-appointed Receiver over the Stanford Receivership Estate, and; (3) has been awaiting repayment for more than nine years, are being overlooked by all parties in this proceeding.

That is, the Claimant's interests are neither being adequately represented by the court-appointed Receiver, or adequately protected by this Court.

STATEMENT OF FACTS

On September 5, 2017, Defendant R. Allen Stanford filed a Motion For Appointment Of Counsel, with and attached "Draft" of a proposed Rule 12(b)(1) Motion To Dismiss.

(Doc. 2576)

On October 12, 2017, Defendant R. Allen Stanford filed the proposed Rule 12(b)(1) Motion To Dismiss.

(Doc. 2596)

On October 23, 2017, Defendant R. Allen Stanford filed a second Motion To Dismiss pursuant to Rules 60(d)(3) and 60(b)(4), alleging a fraud upon the Court, and a companion Motion To Recuse Judge David C. Godbey pursuant to 28 U.S.C. 455(a).

(Doc. 2602)

On October 31, 2017, Defendant R. Allen Stanford filed an Emergency Motion To Amend Pending Rule 12(b)(1).

(Doc. 2605)

The sum of this series of Motions, is a seemingly meritorious challenge to the validity of the SEC's February 16, 2009 enforcement action against Defendant R. Allen Stanford and his global group of financial services companies. And, in the event that Mr. Stanford prevails in this challenge, the result would represent a swift and dramatic reversal of fortunes for the Defendants, as well as for the Claimants.

More specifically, liability for the multiple billions of dollars in losses to the Claimants would immediately shift from the Defendants to that of the United States Securities and Exchange Commission.

#### CLAIMANTS COMPLAINT

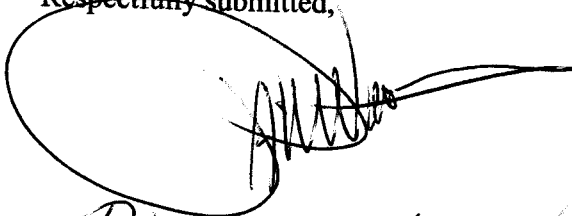
Prior to filing this Motion For Leave To Intervene, the Claimant noted that while no ruling has been forthcoming on any of the aforementioned Motions filed by Defendant R. Allen Stanford, who was proceeding pro se, this Court has adjudicated numerous other Motions filed by counsel representing other parties in this action.

Most notably, the Claimant submits that this Court has already granted the Receiver's Forty-Seventh Fee Applications for approximately \$2 million, which was filed "after" each of Defendant Stanford's Motions. (see, Doc. 2622-2647)

CONCLUSION

Because the Claimant has a substantial economic interest in the outcome of this litigation and, if successful, Defendant Stanford's challenge would produce a favorable outcome for the Claimant, I ask that the Court grant the requested leave to intervene, and that it render a decision as to this challenge without further delay.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Pierre A M Wouters", written over a large, loopy oval shape.

Pierre A M Wouters

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CERTIFICATE OF SERVICE

I, the Claimant, hereby swears under penalty of perjury, 28 U.S.C. 1746, that on this 5<sup>th</sup> day of MARCH ~~January~~, 2018, a copy of this "Motion For Leave To Intervene" was placed in the U.S. Mail addressed to:

U.S. Securities and Exchange Commission

Fort Worth Regional Office

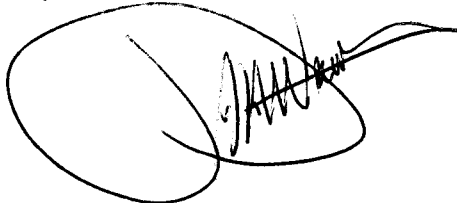
Burnett Plaza, Suite 1900

801 Cherry Street, Unit # 18

Fort Worth, Texas 76102-6882

*Pierre A M Wouters*

(Claimants names)



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ACCOUNT NRS  
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